

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

MARK HOFFMAN, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

HEARING HELP EXPRESS, INC.,
TRIANGULAR MEDIA CORP.,
LEADCREATIONS.COM, LLC and LEWIS
LURIE,

Defendants.

NO. 3:19-cv-05960-MJP

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
DEFAULT AS TO DEFENDANT
TRIANGULAR MEDIA
CORPORATION**

THIS MATTER is before the Court on the motion of the Plaintiff for an Order of Default against the Defendant Triangular Media Corporation, and it appearing from the files and records of this Court in this cause that venue is proper in this matter and personal service was had upon Defendant Triangular Media by serving Dana Lurie, Registered Agent, 5841 NW 122nd Drive, Coral Springs, Florida 33076 on June 10, 2020, at 9:00 p.m., and that more than twenty-one (21) days have elapsed since that date, and that Plaintiff has complied with L.R. 55(a), Defendant Triangular Media Corporation, having failed to answer in any manner whatsoever, is wholly in default, and the Court being fully advised, it is now

ORDERED that Defendant Triangular Media Corporation is hereby in default.

1 IT IS FURTHER ORDERED that the Plaintiff may schedule a hearing at which time
2 the Court shall take evidence to determine the damages sustained by the Plaintiff and that entry
3 of a default judgment shall be entered at said hearing.

4 IT IS SO ORDERED this ____ day of _____, 2020.

5
6
7 UNITED STATES DISTRICT JUDGE
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I, Adrienne D. McEntee, hereby certify that on September 17, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

David E. Crowe, WSBA #43529
Email: dcrowe@vkclaw.com
VAN KAMPEN & CROWE PLLC
1001 Fourth Avenue, Suite 4050
Seattle, Washington 98154
Telephone: (206) 386-7353
Facsimile: (206) 405-2825

Ana Tagvoryan, *Admitted Pro Hac Vice*
Email: atagvoryan@blankrome.com
Nicole Bartz Metral, *Admitted Pro Hac Vice*
Email: nbmetral@blankrome.com
BLANK ROME LLP
2029 Century Park East, 6th Floor
Los Angeles, California 90067
Telephone: (424) 239-3400
Facsimile: (424) 239-3434

Jeffrey Rosenthal, *Admitted Pro Hac Vice*
Email: rosenthal-j@blankrome.com
BLANK ROME LLP
130 North 18th Street
Philadelphia, Pennsylvania 19103
Telephone: (215) 569-5500
Facsimile: (215) 569-5555

Attorneys for Defendant Hearing Help Express, Inc.

Carl J. Marquardt
Email: carl@cjmp LLC
LAW OFFICE OF CARL J. MARQUARDT, PLLC
1126 34th Avenue, Suite 311
Seattle, Washington 98122-5137
Telephone: (206) 388-4498

Edward Maldonado, *Admitted Pro Hac Vice*

Email: eam@maldonado-group.com

Email: awclerk@maldonado-group.com

MALDONADO LAW GROUP

2850 S. Douglas Road, Suite 303

Coral Gables, Florida 33134

Telephone: (305) 477-7580

Attorneys for Defendant Lewis Lurie

DATED this 17th day of September, 2020.

TERRELL MARSHALL LAW GROUP PLLC

By: /s/ Adrienne D. McEntee, WSBA #34061

Adrienne D. McEntee, WSBA #34061

Email: amcentee@terrellmarshall.com

936 North 34th Street, Suite 300

Seattle, Washington 98103

Telephone: (206) 816-6603

Facsimile: (206) 319-5450

Attorneys for Plaintiff and the Proposed Class